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The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court for the
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Mejia v. Manzur, Manzur v. New York State Office of the
Attorney General, 10CV3342 (RLM)

Dear Magistrate Judge Mann:

We have a May 26th conference before Your Honor in the above-captioned matter. This is predicated upon the anticipated completion of all discovery in this case.

However, the IME doctor who has been designated and has possession of the copious medical records of the plaintiffs in this action, Maria Mejia, Jasmin Giron and Wilma Delgado (who is also a defendant) cannot complete the IMEs until June 6 for Mejia and Giron and June 13th for Delgado. For the convenience of the parties, Dr. William Head will conduct the Mejia and Giron IME's in New Jersey where those plaintiffs reside; he will conduct the IME of Delgado in Staten Island where Ms. Delgado resides.

In view of the fact that these IMEs can only be held in June due to the busy schedule of Dr. Head, I am requesting that the Court extend the discovery deadline, and change the date of the May 26th conference to reflect the timing of the scheduled IMEs.

Additional time after the IMEs will be required for the doctor to prepare his report and for our office to exchange the report.

two plaintiffs, Jasmin Giron and Wilma Delgado, have orthopedic injuries. We have designated Dr. Choueka to examine the shoulder of Delgado, and Dr. Grelsamer to examine Ms.

SO ORDERED:

/s/

Roanne L. Mann
U.S. Magistrate Judge
Dated: 5/2/11

Application
denied, as
the movant has
not first
consulted with

the other parties
to ascertain
whether they
consent or

May 2, 2011
oppose the
request; moreover,
the movant has not shown
good cause for reopening
defendants' period for
serving expert disclosure,
which ended on April 15, 2011.

See 3/7/11 Endorsed
Order.

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Giron. It is anticipated that these IMEs will be concluded in May, but reports may not be generated and exchanged in sufficient time for a meaningful conference on May 26.

With this in mind, it is respectfully requested that discovery be extended and that the conference date be changed.

A copy of this letter has been faxed to each of the other three attorneys in this matter prior to the transmittal of this letter to the Court.

Thank you for your kind consideration of this request.

Sincerely,

CONNORS & CONNORS, P.C.

By:



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LAR/mc

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